

ZETLIN & DE CHIARA, LLP

Attorneys for Defendant

Polshek Partnership LLP

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
HARTFORD FIRE INSURANCE COMPANY as
subrogor of Lycee Francais De New York,

07 Civ. 4084 (SHS) (AJP)

Plaintiff,

-against-

MAYRICH CONSTRUCTION CORP., LANGAN
ENGINEERING & ENVIRONMENTAL SERVICES,
INC., F.J. SCIAME CONSTRUCTION CO., INC.,
POLSHEK PARTNERSHIP, LLP & CANTOR
SEINUK GROUP, INC.,

Defendants.

----- X
**DEFENDANT POLSHEK PARTNERSHIP LLP'S
RESPONSE TO MAYRICH CONSTRUCTION CORP. AND F.J. SCIAME
CONSTRUCTION CO., INC.'S NOTICE TO PRODUCE PURSUANT TO RULE 26**

Defendant Polshek Partnership LLP ("Polshek") by its attorneys Zetlin & De Chiara LLP, submits the following as and for its response to Defendants Mayrich Construction Corp. and F.J. Sciame Construction Co., Inc.'s Notice to Produce Pursuant to Rule 26, dated July 26, 2007:

TO ALL PARTIES:

- A) Each and every primary, contributing and excess insurance agreement under which any person carrying on an insurance business may be liable to indemnify any party for part or all of any loss giving rise to this action or to indemnify or reimburse the plaintiff(s) for payments made as a result of said loss.

- B) Each and every insurance agreement in which the insurer is the real party in interest in this action.

RESPONSE:

Polshek objects to this request as overly broad, unduly burdensome and not reasonably tailored to lead to the production of admissible evidence. Notwithstanding this objection, please see Polshek's Initial Rule 26 Disclosure, dated August 7, 2007.

Polshek reserves the right to amend its disclosures pursuant to the requirements of the FRCP.

Dated: New York, New York
August 23, 2007

ZETLIN & DE CHIARA, LLP

By: 

Bill Chimos (BC-9381)

*Attorneys for Defendant Polshek
Partnership LLP*

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TO: SEE SERVICE LIST